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FCC
Public Comment
RM-11810

Before the commission for consideration is RM-11810.

I am in FULL support of this petition. As a broadcast engineer and someone who has been active in the broadcast industry for 40 years, I have seen the many changes to broadcasting and the Communications Act over the years. The FCC's rules allowed for consolidated ownership greatly limiting voices in the community. It took a "personal industry" of family ownership and made it a "corporate entity".

When the FCC approved LPFM's about 15 years ago, we began hearing new voices in communities... a first in many years! Though not all LPFM's have succeeded (the same as any broadcast venture), most have.. and most provide great service to their communities.

I've personally been involved with a few LPFM's and can site a few examples of how they make a significant difference to their communities. First, WNHS LP was licensed to a town of 4,000 people in Newcomerstown, Ohio. This town sits in a valley and has difficulty receiving very many signals. Additionally, as a small town, the stations from outside the area that did get a signal in had little to nothing to do with that little town or her people. There was no coverage of city events and no community involvement by these other stations. WNHS launched about 13 years ago and was licensed to Newcomerstown City Schools. They opted for a mainstream format that would be of interest to the largest population of the city and quickly became the city's "hometown station". You could go into many businesses and hear WNHS... and it remains this way today!

Another station which launched with the most recent rounds of licensing of LPFM's is KPGC LP in Norman, AR. Again, another very small town (only a few hundred residents) which was completely ignored by larger broadcasters. KPGC IS Norman, Arkansas and has made great strides in building an audience and providing this community with its OWN voice!

WDNP LP is another example of an LPFM integrating itself into the community. DNP stands for Dover – New Philadelphia, and the station has excellent coverage of both of these cities which lay nestled in a valley in Tuscarawas County, Ohio. The station is located in an old JC Penney building with their antenna on the roof, which actually gives a negative HAAT (since these cities are in a valley). WDNP was able to choose more tradition, mainstream formats since there were only three radio stations in this county of 88,000 which were targeting the people IN this area (the fourth station moved its studio to Canton, OH, a much larger city and branded itself as a "Canton station" a number of years ago. According to Nielsen, within six months of going

on the air, a Nielsen representative called and inquired about WDNP saying “you have a significant number of listeners”. This would be reflected by the calls, by the number of cars driving around the city where you can hear “DNP 102.3” coming from, and even the large amount of businesses that you can walk in to and hear WDNP playing on their radios.

In addition, DNP serves to act as the voice for all other non-profits in the area. When the American Red Cross asked the local heritage AM station with their new 250w FM translator to assist in a blood drive, that station wanted an unreasonable fee to provide something that any station SHOULD consider to be “of community service” (certainly a reason stations are licensed). WDNP immediately jumped at the opportunity assisting the Red Cross with a VERY successful blood drive (and was recognized by the Red Cross for this). This isn't a rare event either. Each year WDNP teams up with the Salvation Army to provide coats, food, and toys for kids as Christmas. In the three years DNP has been in existence, it's made a difference in the lives of many people in support of MANY non-profit organizations.

But these stations (WDNP, KPGC, and WNHS), as is the case with LPFM's across the United States, lack any real protection from new translators and full power stations. Years of work and “audience building” can quickly be impacted by the lack of consideration the FCC has given towards protecting stations that do no less than any full-powered station when it comes to serving their community. This is why I ask the commission to provide additional protection to LPFM services in consideration of their service to the areas in which they serve.

Additionally, the 100 watts does a fair job of covering many small towns, and works very well with car radios, but as the FCC is aware, signal penetration with 100 watts is very difficult. And towns like Dover & New Philadelphia, Ohio (like many other cities supported mainly or only by LPFM's) are geographically spread out just a little too far to cover their cities effectively. The proposal of allowing some LPFM's (especially outside of major metropolitan areas) to go to 250 watts would make a significant difference for many listeners and allow LPFM's to do a better job serving their small communities.

It's with appreciation that I request the FCC consider this petition and move forward to improve and protect the LPFM radio service.

Respectfully,

Daniel Slentz